

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

CHELSEA C. ELINE, ET AL.

Plaintiffs

v.

TOWN OF OCEAN CITY, MARYLAND

Defendant

CASE NO. 1:18-cv-00145-JKB

Granted
[Signature]
10/23/18

JOINT MOTION FOR MODIFICATION OF SCHEDULE

NOW COME Plaintiffs, CHELSEA C. ELINE, MEGAN A. BRYANT, ROSE R. MACGREGOR, CHRISTINE E. COLEMAN, and ANGELA A. URBAN, by and through their undersigned counsel, Devon M. Jacob, and Defendant, TOWN OF OCEAN CITY, MARYLAND, by and through its undersigned counsel, Bruce F. Bright and Guy R. Ayres III, and respectfully jointly move for a modification of the Schedule, and in support thereof, state as follows:

1. The parties have previously agreed to, and this Honorable Court has approved, a schedule for disposition of the Plaintiffs' motion for preliminary injunction, which culminates in a hearing on the motion on December 7, 2018. Although some discovery has been initiated (Defendant has served written discovery requests), proceedings related to the motion for preliminary injunction have, in effect, delayed full blown discovery.

2. The parties' counsel have conferred and are in agreement that, in light of the pendency of the motion for preliminary injunction until at least December 7, 2018, an extension of the overall schedule for this case (including the schedule for discovery) is appropriate, so that the bulk of discovery can and will occur after the preliminary injunction hearing.

3. On that basis, the parties jointly propose the following modified schedule:

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
A. Plaintiff's Rule 26(a)(2) disclosures	10/05/18	02/05/19
B. Defendant's Rule 26(a)(2) disclosures	11/05/18	03/05/19
C. Plaintiff's rebuttal Rule 26(a)(2) disclosures	11/05/18	03/19/19
D. Rule 26(e)(2) supplementation of disclosures and responses	11/12/18	03/26/19
E. Discovery deadline; submission of status report	12/04/18	04/16/19
F. Requests for admissions	12/11/18	04/23/19
G. Dispositive pre-trial motions deadline	01/07/19	05/17/19

WHEREFORE, the Parties respectfully request that this Honorable Court grant their Joint Motion for Modification of Schedule, and modify the Schedule as previously outlined.

Date: 10/23/18

Respectfully submitted,

/s/ Devon M. Jacob

Devon M. Jacob
(signed by Bruce F. Bright with permission)
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